

Juror Name: _____

Juror Number: _____

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X

UNITED STATES OF AMERICA

- against -

21 CR 371 (S-1) (BMC)

THOMAS JOSEPH BARRACK and
MATTHEW GRIMES,

Defendants.

-----X

THE HONORABLE BRIAN M. COGAN
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK
225 CADMAN PLAZA EAST
BROOKLYN, NEW YORK

THIS PAGE IS THE QUESTIONNAIRE COVER SHEET.
PLEASE TAKE OFF THIS PAGE AND TAKE IT WITH YOU.

After submitting this form, please **CALL** the below telephone number on _____, 2022, after __:__ p.m. Upon calling, you will receive instructions about the date on which you are to report back to court. It is extremely important that you know the juror number written on the top of this form when you make your call. Thank you.

Phone number: 1-800-522-5100

Date to Call: _____, 2022

Time to Call: After __:__ p.m.

Juror Name: _____

Juror Number: _____

JUROR QUESTIONNAIRE

**THE ANSWERS TO THE QUESTIONS ON THIS PAGE WILL BE DISCLOSED
ONLY TO THE APPROPRIATE PERSONNEL AS DIRECTED BY THE PRESIDING
JUDGE**

Please print the following information:

Name: _____

Home Address: _____

Home Phone: _____

Cellular Phone: _____

Job Title & Department: _____

Business Address: _____

Business Phone (Including Extensions): _____

I hereby declare, under penalty of perjury, that the foregoing information, and all of the answers in this questionnaire, are true, correct, and complete to the best of my knowledge.

Date: _____

SIGNATURE

Juror Name: _____

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UNITED STATES v. BARRACK and GRIMES
JUROR QUESTIONNAIRE INSTRUCTIONS

TO THE PROSPECTIVE JUROR:

Welcome to the courthouse and thank you for participating in jury service. This questionnaire is an important part of the jury selection process. You are sworn to give complete and truthful answers – under penalty of perjury – to the questions that follow. All of the information you provide will be kept confidential and will be seen only by the Judge, the Clerk’s Office and the members of the prosecution and defense teams, including the defendants.

There are no “right” or “wrong” answers to these questions; just answer honestly and completely. Please answer each question by placing a check next to the correct response and by providing the information requested. Take your time and answer each question as fully as possible. Answer all questions. If you cannot answer a question because you do not understand it, write “do not understand” next to the question. If a question does not apply to you, fill in the space with an “N/A” for “not applicable.” If you request that your response to a particular question not be made public, write “PRIVATE” in the space next to the question. The Judge may ask you about the topic in a nonpublic session at a later date. Do not leave any answer blank.

Write in dark ink and as legibly as possible. Please do not write on the back of any page. If you need extra space, you may continue your answer in the space provided at the end of the questionnaire.

It is very important that you not discuss this questionnaire or your answers with friends, family, co-workers, court personnel or anyone else. The answers that you provide must be yours and yours alone. From this point forward, do not read or listen to any news about this case, including anything about the case on TV, radio, newspaper, websites, bios, or social media. Do not discuss this case with anyone, including your family. Do not research this case or the people involved: do not research any of the facts presented in this questionnaire, any prior court proceedings, the victims, the defendant, the lawyers and/or the Judge. This includes research conducted on the internet or through any other source of information.

Jury service is one of the most important duties a citizen can be called on to perform. You will fulfill that civic duty by responding completely and honestly during jury selection. The Court appreciates your participation and cooperation.

Hon. Brian M. Cogan, United States District Court Judge

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UNITED STATES v. BARRACK and GRIMES

CASE SUMMARY

The criminal case about to be tried is the result of charges filed against Thomas Joseph Barrack, a former head of an investment fund, and Matthew Grimes, a former employee of that investment company and Mr. Barrack. The indictment charges that Mr. Barrack, a United States citizen, acted as an agent of a foreign government, specifically, the United Arab Emirates, without prior notification to the Attorney General of the United States, obstructing justice, and making materially false statements to the government. The indictment charges that Mr. Grimes, a United States citizen, acted as an agent of the United Arab Emirates without prior notification to the Attorney General of the United States. The indictment also charges Mr. Barrack and Mr. Grimes with conspiring to act as unregistered agents of the United Arab Emirates.

Mr. Barrack and Mr. Grimes each pled not guilty to the charges in the indictment, and each asserts his innocence of all crimes charged. The charges that have been filed are only a statement of the charges, are not evidence and do not mean that either of the defendants are guilty. You must presume each defendant's innocence and the jury must find them not guilty for each crime unless and until the government proves each defendant's guilt for each crime beyond a reasonable doubt.

This is just a summary of the charges to give you some background on the case. The Court will instruct the jury on the elements of the crimes charged and the applicable law at a more appropriate time during trial.

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BACKGROUND QUESTIONS

1. Name: _____

2. Age: _____

3. Sex: _____

4. What is your current relationship status (check all that apply)?

☐ Married _____ years

☐ Divorced

☐ Separated

☐ Widowed

☐ Single, never married

☐ Single, living with another person as a couple

☐ Other: _____

5. Place of Birth: _____

6. Where were you raised?

7. Where were your parents born and raised?

Father

Mother

Born _____

Born _____

Raised _____

Raised _____

8. Are you a citizen of the United States? ☐ Yes ☐ No

9. Are you a citizen of any other country? ☐ Yes ☐ No

If yes, please list:

10. Is English your first language?

[] Yes [] No

a. If no, what is your first language? _____

b. How well do you understand *written* English?

[] Well [] Not Very Well [] Poorly

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c. How well do you understand *spoken* English?

[] Well [] Not Very Well [] Poorly

d. If English is not your first language, what is your comfort level with written and spoken English? _____

11. Do you read, write or understand Arabic? ☐ Yes ☐ No

If yes, would you have any difficulty relying solely on a translator's translation of Arabic? ☐ Yes ☐ No

12. Do you have any condition or issue that would affect your ability to serve as a juror, including difficulty hearing, seeing, reading, or concentrating?

☐ Yes ☐ No

If yes, please describe:

If you feel that you could serve with accommodations, please indicate those accommodations:

13. Where do you live?

☐ Brooklyn ☐ Queens ☐ Staten Island ☐ Nassau ☐ Suffolk

City/Town _____ Neighborhood (if any) _____

14. How long have you lived at your current residence? _____

15. Do you rent, own or live with family/friends? _____

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16. With whom do you live?

☐ Alone

☐ Child(ren)

☐ Sibling(s)

☐ Spouse/partner

☐ Parent(s)

☐ Roommate(s)

☐ Other: _____ (please specify)

17. Where else have you lived in the last 8 years?

[Please do not list any specific addresses.]

18. Have you ever lived in another country? ☐ Yes ☐ No

Country

Dates of residence

Reason

Country	Dates of residence	Reason
_____	_____	_____
_____	_____	_____
_____	_____	_____

19. Have you ever traveled outside of the United States? ☐ Yes ☐ No

If yes, please describe where and approximately when:

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20. If you have children, please list the following for each:

<u>Sex</u>	<u>Age</u>	<u>Education Level</u>	<u>Occupation</u>	<u>Place of Residence</u>
Minor or over 18	Gender	Living with you (Y/N)	Child's highest level of education	Type of occupation (do <u>not</u> list employer or school)

21. What is the highest level of education you completed?

☐ Grade School ☐ Some High School ☐ High School Graduate

☐ Tech/Trade School ☐ Some College ☐ Associate Degree

☐ College Graduate Major/degree: _____(please specify)

☐ Post Graduate Major/degree: _____(please specify)

22. If you are currently pursuing or previously pursued an educational certificate or degree, what degree were/are you seeking and what was/is your major area of study?

23. Do you hold any professional licenses? If so, please list:

Juror Name: _____**Juror Number:** _____

24. Have you, a family member or anyone close to you ever had, applied for, or planned to seek any education, training, employment or volunteer experience in the following areas (please check all that apply):

Corrections/Jails/Prisons	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Courts/Probation/Parole	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Criminal Justice/Criminology	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
International Relations/Foreign Service	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Forensic Science/Crime Scene Investigation	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Human Behavior/Psychology/Sociology	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Islamic Studies/Law	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Journalism/Media/Communications	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Law/Legal Field	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Marketing/Persuasion/Advertising	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Middle Eastern Studies/History	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Security/Intelligence	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend
Lobbying/Politics	<input type="checkbox"/> Myself	<input type="checkbox"/> Family/Friend

If yes to any of above, please state the nature of the education, training, work or volunteer experience, location, dates of participation/employment, name of organization and, if other than yourself, please state the person(s) relationship to you:

25. Have you, a family member, or a very close friend ever worked in law enforcement (including state or local police departments, the FBI, US Marshals, U.S. Citizenship and Immigration Services, Immigration and Customs Enforcement, Customs and Border Protection, Internal Revenue Service, police department, any state or federal prosecutor's office, the Bureau of Prisons or any state or local prison system)?

[] Yes, me [] Yes, someone close to me [] No

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- a. If yes, please explain who worked in law enforcement, which law enforcement agency you/they worked at, and the position you/they held:

If yes, would that experience prevent you from evaluating the evidence in this case in a fair and impartial manner?

☐ Yes ☐ No

If yes, please explain:

26. Are you, a family member, or a very close friend studying or planning to work in law enforcement?

☐ Yes, me ☐ Yes, someone close to me ☐ No

If a relative or close friend has been or is employed by a law enforcement agency, have you discussed his or her work? If so, in what level of detail? (For example, "discussed generally," or "discussed his work frequently.")

If yes, would that experience prevent you from evaluating the evidence in this case in a fair and impartial manner?

☐ Yes ☐ No

If yes, please explain:

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27. Have you or any immediate family member ever participated in any group that lobbies or takes public positions on social, political, or legal issues?

☐ Yes ☐ No

If yes, please offer a general description of the group and its work without naming the group.

Would that experience prevent you from evaluating the evidence in this case in a fair and impartial manner?

☐ Yes ☐ No

If yes, please explain:

28. What is your current employment status? (Please check all that apply)

- | | | |
|--|--|--|
| <input type="checkbox"/> Working more than one job | <input type="checkbox"/> Self Employed | <input type="checkbox"/> Disabled |
| <input type="checkbox"/> Working full time | <input type="checkbox"/> Homemaker | <input type="checkbox"/> Laid off |
| <input type="checkbox"/> Working part time | <input type="checkbox"/> Full-time student | <input type="checkbox"/> Retired ____ (year) |
| <input type="checkbox"/> Unemployed | <input type="checkbox"/> Other: _____ | |

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29. Complete the following for your current job or, if not currently employed, your most recent job. If you have more than one job, complete for all jobs.

Employer

Job title

_____	_____
_____	_____
_____	_____

- a. How long have you worked at your most recent job(s)? _____

- b. What are/were your job duties and responsibilities? _____

30. If you are retired or unemployed, how long have you been retired or unemployed?

31. What other jobs have you had in in the last ten years?

Have you or any of your family members ever owned a business?

☐ Yes, me ☐ Yes, family member ☐ No

If yes, please explain, including the nature of the business, the number of employees and

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whether it's still in operation:

32. Have you ever had any education, training, or work experience in the following areas?
(Please check all that apply)

- | | |
|--|--|
| <input type="checkbox"/> Banking/Finance | <input type="checkbox"/> Investigation |
| <input type="checkbox"/> Economics | <input type="checkbox"/> Compliance/regulatory oversight |
| <input type="checkbox"/> Journalism | <input type="checkbox"/> Sales |
| <input type="checkbox"/> Business administration | <input type="checkbox"/> Business development |
| <input type="checkbox"/> Accounting | <input type="checkbox"/> Real estate/real estate development |
| <input type="checkbox"/> Bookkeeping | <input type="checkbox"/> Real estate financing/Lending |
| <input type="checkbox"/> Securities/Investments | <input type="checkbox"/> International business/relations |

If Yes to any of the above, please explain:

Have you ever had a job considered management?

☐ Yes ☐ No

If Yes, please explain including when, your job title, and number of employees supervised:

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Juror Number: _____

33. If you are married or live with a partner, what is your spouse's or partner's highest level of education, most recent employer, and most recent job title?

34. Does anyone else in your household work outside the home? If yes, please provide the nature of the relationship (for example, spouse or child) and the type of work he or she does. If the individual is retired or not employed, please indicate and describe the type of work he or she did during his or her last period of employment. **(Please do not name any employer)**

35. What are/were your parents' occupations? If retired or deceased, what did they do?

Mother: _____ Father: _____

36. How important is religion in your life?

☐ Very important ☐ Somewhat important

☐ Not very important ☐ Not important at all

37. What community, civic, social, union, professional, fraternal, political, religious, recreational organizations do you belong to, or are otherwise affiliated with (for example, PTA, Rotary Club, political action committees, etc.)? Please identify the organization(s).

38. Have you ever held a leadership position in any of the organizations you are affiliated with? ☐ Yes ☐ No

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39. If Yes, please explain, including the position, organization, and for how long:

40. Have you or an immediate family member ever served in the military (including the reserves, National Guard or ROTC)?

☐ Yes, myself ☐ Yes, family, please specify: _____
☐ No

If yes, please indicate the branch of service, highest rank, dates of service, foreign stations or tours, type of discharge, duties and any special training or honors received:

If yes, would that experience prevent you from evaluating the evidence in this case in a fair and impartial manner?

☐ Yes ☐ No

If yes, please explain:

41. Have you, a family member or anyone close to you ever been employed, volunteered or had any other affiliation with any aspect of criminal prosecutions or criminal defense work or applied or planned to apply to do so?

☐ Yes, Criminal Prosecution ☐ Yes, Criminal Defense ☐ No

If yes, please indicate the person's relationship to you (if not you), area of law, type of work/ experience, dates, and location.

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42. Do you have any opinions about prosecutors or criminal defense attorneys that would impact your ability to fairly and impartially evaluate the evidence in this case?

☐ Yes ☐ No

If yes, please explain.

43. On how many cases have you served as a trial juror?

☐ None ☐ 1 ☐ 2 ☐ 3 or more

b. Where was the jury service? ____

c. What type of cases?

☐ Civil ☐ Criminal ☐ Both

d. Did all of the juries reach a verdict?

☐ Yes ☐ No

e. Did you ever serve as the jury foreperson?

☐ Yes ☐ No

f. How would you describe your jury service?

☐ Positive ☐ Negative ☐ Mixed

g. If you have served on a jury, did anything happen that might have any bearing on your ability to be a juror in this case?

☐ Yes ☐ No

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If Yes, please explain:

44. Have you ever served as a grand juror?

☐ Yes ☐ No

a. If Yes, were you the foreperson of the grand jury? ☐ Yes ☐ No

b. If you have ever served as a grand juror, did anything happen that might have any bearing on your ability to be a juror in this case?

☐ Yes ☐ No

c. If Yes, please explain:

45. If you have served on a jury before, did you learn anything after your verdict was reached that caused you to question your verdict or vote?

☐ Yes ☐ No

a. If Yes, please explain:

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EXPERIENCES AND BELIEFS

46. Do you have any opinions or beliefs concerning the criminal justice system that would affect your ability to be a fair and impartial juror?

☐ Yes ☐ No

If yes, please explain.

47. Do you have any opinions or beliefs concerning law enforcement in general – including, the Federal Bureau of Investigation or the Department of Justice – that would affect your ability to evaluate the evidence in this case fairly and impartially?

☐ Yes ☐ No

If yes, please explain.

48. Have you, a family member, or a very close friend ever:

	Yourself	Family Member	Friend
Been a witness in a criminal matter?			
Been a witness in a civil matter?			
Been a plaintiff in a lawsuit/sued someone?			
Been a defendant in a lawsuit/sued by someone?			

If none of these apply, please check here: []

- a. If you checked Yes to any of the above, please explain, including who (relationship to you):

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b. If Yes, would this have any bearing on your ability to be a fair juror in this case?

☐ Yes ☐ No

c. If Yes, please explain: _____

49. Have you, a family member, or a very close friend ever been the victim of a crime?

☐ Yes, me ☐ Yes, someone close to me ☐ No

a. If Yes, please explain including who (relationship to you): _____

b. If Yes, did you or the person close to you report it to the police?

☐ Yes ☐ No

c. Were you/they satisfied with the way law enforcement handled the matter?

☐ Yes ☐ No

d. Why or why not? _____

e. If Yes, would anything about the experience, including dealings with police or law enforcement, have any bearing on your ability to serve as a fair and impartial juror in this case?

☐ Yes ☐ No

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f. If Yes, please explain:

50. Have you, a family member, or a very close friend ever been accused of or convicted of a crime?

☐ Yes, me ☐ Yes, someone close to me ☐ No

a. If Yes, please describe what happened, including who was involved (relationship to you): _____

b. Were you/they satisfied with the way law enforcement handled the matter?

☐ Yes ☐ No

c. If Yes, would anything about the experience, including dealings with police or law enforcement, have any bearing on your ability to serve as a fair and impartial juror in this case?

☐ Yes ☐ No

d. If Yes, please explain:

e. Do you feel you/they were treated well by your own attorney(s)? ☐ Yes ☐ No

Please explain: _____

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51. Have you, a family member or close friend ever been stopped, questioned, investigated, arrested, prosecuted, or convicted of a crime, other than a traffic ticket, by any law enforcement officer or agency?

☐ Yes (self) ☐ Yes (friends/family) ☐ No

If yes, please describe the circumstances surrounding the investigation, accusation, any arrest/charges, the result of any prosecution and your relationship to the person(s) involved.

Do you believe that the persons involved (or yourself, if applicable) were fairly treated in connection with such matter?

☐ Yes ☐ No

If no, please explain your relationship to the person(s) involved and why you believe that you or the person(s) involved were not treated fairly.

Did you form any opinions about or attitudes towards the criminal justice system because of that experience?

☐ Yes ☐ No

If yes, please explain.

Is there anything about any such experience that would affect your ability to fairly and impartially evaluate the evidence in this case?

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☐ Yes ☐ No

If yes, please explain.

52. Have you ever filed a complaint against a lawyer, a judge or anybody else involved in the legal system?

[] Yes [] No

a. If Yes, please describe the complaint: _____

53. Have you ever followed any trials closely on TV, the radio, newspapers or the Internet?

[] Yes [] No

b. If Yes, please state which trials you followed and why you were interested in them:

54. Regardless of what the law may be, a defendant in a criminal trial should be required to produce evidence to prove that he or she is not guilty.

[] Strongly agree

[] Somewhat agree

[] Somewhat disagree

[] Strongly disagree

55. The testimony of an FBI agent is more credible than the testimony of another witness.

[] Strongly agree

[] Somewhat agree

[] Somewhat disagree

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☐ Strongly disagree

56. Have you, or any person close to you, ever been involved in a court proceeding, a grand jury proceeding, or any other legal proceeding as a plaintiff, defendant, victim or witness for any reason?

☐ Yes (self) ☐ Yes (family) ☐ Yes (other) ☐ No

If yes, please explain: _____

57. Have you or a close friend or family member ever been in prison?

☐ Yes (self) ☐ Yes (friends/family) ☐ No

If yes, please explain the circumstances:

If yes, would this affect your ability to be fair and impartial in this case?

☐ Yes ☐ No

If yes, please explain:

58. What publicly known person do you most admire and why?

59. What publicly known person do you least admire and why?

60. How often do you follow the news?

☐ Every day ☐ Almost every day ☐ Several times a week

☐ Several times a month ☐ Never

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61. Which sources do you regularly rely on for news?

- ☐ Television ☐ Newspapers ☐ Radio ☐ Internet searches
- ☐ Magazines ☐ Personal conversations ☐ Facebook ☐ Twitter
- ☐ Other (list other sources): _____

62. What are your main sources of news? (Please check all that apply.)

- | | |
|---|--|
| <input type="checkbox"/> ABC | <input type="checkbox"/> Daily News |
| <input type="checkbox"/> CBS | <input type="checkbox"/> New York Post |
| <input type="checkbox"/> NBC | <input type="checkbox"/> New York Times |
| <input type="checkbox"/> Fox | <input type="checkbox"/> NPR |
| <input type="checkbox"/> CNN | <input type="checkbox"/> Drudge Report |
| <input type="checkbox"/> MSNBC | <input type="checkbox"/> Bloomberg |
| <input type="checkbox"/> CNBC | <input type="checkbox"/> Wall Street Journal |
| <input type="checkbox"/> BBC | <input type="checkbox"/> Financial Times |
| <input type="checkbox"/> PIX11 | <input type="checkbox"/> Newsday |
| <input type="checkbox"/> Spectrum NY1 | <input type="checkbox"/> Huffington Post |
| <input type="checkbox"/> Al Jazeera | <input type="checkbox"/> Talk Radio |
| <input type="checkbox"/> Comedy current events shows (The Daily Show, Full Frontal with Samantha Bee, The Amber Ruffin Show, Last Week Tonight) | |
| <input type="checkbox"/> Social Media (Facebook, Twitter, YouTube, etc.) | |
| <input type="checkbox"/> Family/Friends | |
| <input type="checkbox"/> Other: _____ | |

63. What magazines or journals do you read?

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64. What radio station(s) do you listen to most often?

65. Have you ever called in to a radio talk show, written a letter to the editor, participated in any webpages or chat rooms on the internet, or posted a comment online?

☐ Yes

☐ No

a. If Yes, what type: ☐ Radio Caller ☐ Letter to the Editor
☐ Blog/Chat Room ☐ Posted Comment

b. If Yes, what topics have you addressed?

66. What is your favorite book and why?

67. What are your favorite television shows?

68. Generally speaking, do you follow crime stories in the media? ☐ Yes ☐ No

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69. What are your favorite Internet sites, pages, apps, or social media sites, including any that you visit for news and current events, celebrity news/gossip, or other sites or apps?

70. What are your hobbies and special interests? What do you like to do in your spare time?

71. What recent criminal or civil trials, if any, have you followed in the media?

How, if at all, did your following of those trial(s) influence your opinion of the judicial system?

72. You may hear testimony from or about the people and places listed on Attachment A during the trial. Please turn to Attachment A at the end of this packet and circle the name of any person or place that you know personally or have or have had any personal connection with.

If you have such a connection, please explain.

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73. Have you, or anyone close to you, ever had any legal action or dispute with the federal government, any state or local government, or any of their agencies, officers, agents, or employees?

☐ Yes ☐ No

If yes, please describe the circumstances surrounding the dispute and your relationship to the person(s) involved. **[Please do not list any names.]**

74. Have you, a family member or close friend ever filed a complaint with the police against anyone?

☐ Yes ☐ No

If yes, please describe the circumstances surrounding the complaint

75. Would others describe you as open minded and willing to listen to and assess different viewpoints?

76. Is there anything about the nature of the charges in the indictment that would affect your ability to be fair and impartial and follow the Court's instructions?

☐ Yes ☐ No

If yes, please explain.

77. Do you have any views or opinions about, or personal or business experiences with, the Middle East, the United Arab Emirates, the Kingdom of Saudi Arabia, the State of

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Qatar, or United States' foreign policy in the Middle East that would affect your ability to serve as a fair and impartial juror in this case?

☐ Yes

☐ No

If yes, please explain.

78. This criminal trial may involve individuals and events associated with the 2016 U.S. Presidential Campaign of Donald J. Trump and the Trump Administration. Do you have any strong feelings about the 2016 U.S. Presidential Campaign of Donald J. Trump or the Trump Administration that would prevent you from being fair and impartial in a case involving individuals associated with those groups?

☐ Yes

☐ No

If yes, please explain.

79. This criminal trial may involve individuals and events associated with the Special Counsel Office's investigation conducted by Robert Mueller. Do you have any strong feelings about the Special Counsel's Office or its investigation that would prevent you from being fair and impartial in a case involving individuals associated with that entity?

☐ Yes

☐ No

If yes, please explain.

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80. Do you know of any reason whatsoever why you could not, or should not, serve as a juror in this case?

☐ Yes ☐ No

If yes, please explain.

81. Have you, a family member, or a very close friend ever run for any public office?

☐ Yes, me ☐ Yes, someone close to me ☐ No

a. If Yes, what was the office and when did you or the person close to you run?

b. If Yes, did you engage in fundraising efforts to support the campaign?

☐ Yes ☐ No

c. If Yes, did you/they win?

☐ Yes ☐ No

82. How closely do you follow politics on a day-to-day basis?

☐ Very closely ☐ Somewhat closely ☐ Not closely at all

83. Have you or has anyone close to you ever worked for, volunteered for, or served in any capacity in the office of any elected official or legislature?

☐ Yes ☐ No

a. If Yes, please explain: _____

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84. How often do you volunteer or work on political campaigns?

☐ Never ☐ Rarely ☐ Often ☐ Every election cycle

85. How often do you attend political rallies or political fundraisers?

☐ Never ☐ Rarely ☐ Often ☐ Every election cycle

86. Do you, a family member, or a very close friend have any experience lobbying any branch of local, state, or federal government?

☐ Yes, me ☐ Yes (family or friend) ☐ No

a. If Yes, please identify the branch and level of government you or the person close to you lobbied, as well as the issues on which you lobbied: _____

87. Are you familiar with any laws or requirements regarding registration with the federal government for lobbying or other activities performed on behalf of someone other than yourself?

☐ Yes ☐ No

a. If Yes, please explain: _____

88. How closely did you follow the 2016 Presidential Election?

☐ Very closely ☐ Somewhat closely ☐ Not closely at all

Juror Name: _____

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89. How closely did you follow news about former President Donald J. Trump?
[] Very closely [] Somewhat closely [] Not closely at all

90. What are your feelings regarding former President Donald J. Trump?

91. What are your feelings regarding individuals who served in the Trump Campaign, his Inaugural Committee or his Administration?

92. Have you seen, read or heard any news stories about criminal investigations involving or potentially implicating former President Trump?

[] Yes [] No

a. If Yes, please describe what you have seen, read, or heard: _____

b. If Yes, have you formed any opinions based on what you have seen, read or heard about these investigations?

[] Yes [] No

c. If Yes, please describe those opinions: _____

Juror Name: _____

Juror Number: _____

93. Would you find it difficult to treat the testimony of someone associated with the former President the same as you would any other witness?

☐ Yes ☐ No

a. If Yes, please explain: _____

94. This case involves allegations surrounding the United Arab Emirates. Have you read, seen, or heard anything about the United Arab Emirates?

☐ Yes ☐ No

95. Please describe what you know about the UAE and your views or feelings about that information. _____

96. Have you, a family member, or a very close friend ever had a job where you dealt with any foreign government or foreign official?

☐ Yes, me ☐ Yes (family or friend) ☐ No

a. If Yes, please explain, including which countries, the employer, job title and for how long:

Juror Name: _____

Juror Number: _____

97. Have you or any of your family members worked for a company that did business in the Middle East?

☐ Yes, me ☐ Yes, someone close to me ☐ No

b. If Yes, please explain, please explain, including the employer, job title and for how long? _____

98. Have you, any of your family members, or close friends ever lived or worked in the United Arab Emirates (UAE), Saudi Arabia, Qatar, Israel or any other Middle Eastern country?

☐ Yes, me ☐ Yes, someone close to me ☐ No

a. If Yes, please explain, including who, where, when and for how long? _____

99. In the past 10 years, have you or a family member traveled to any of these countries: United Arab Emirates, Saudi Arabia, Qatar, Israel, Egypt, Jordan, Kuwait, or Lebanon?

☐ Yes, me ☐ Yes, family member ☐ No

a. If Yes, please list the country(ies) you traveled to, when you traveled there, and whether the purpose for your travel was for business or vacation?

b. As a result of your travel experiences, or for any other reason, do you have strong views about any of the listed countries? ☐ Yes ☐ No

If Yes, please explain your views:

Juror Name: _____

Juror Number: _____

100. Do you have any strong negative opinions of any of the following Middle Eastern countries? (Please check all that apply)

☐ Egypt ☐ Israel ☐ Saudi Arabia

☐ Jordan ☐ Kuwait ☐ Lebanon

☐ Qatar ☐ United Arab Emirates

a. If you checked any of the above countries, please explain: _____

101. Do you have any strong views on any of the positions President Trump has taken with respect to the Middle East?

☐ Yes ☐ No

b. If Yes, please explain: _____

c. How did you learn about this issue? _____

102. Do you have any strong views on foreign investments in the United States or U.S. companies investing in foreign countries?

☐ Yes ☐ No

d. If Yes, please explain: _____

Juror Name: _____

Juror Number: _____

LEGAL PRINCIPLES

103. The defendants are presumed innocent and cannot be found guilty unless the jury, unanimously and based solely on the evidence in this case and the law as the Court instructs, decides the government has proven their guilt beyond a reasonable doubt. The burden of proving guilt rests entirely with the government. The defendants have no burden of proof at all.

Will you accept and apply this rule of law?

☐ Yes ☐ No

If no, please explain.

104. The indictment that was filed against the defendants is the means by which the government gives them notice of the charges against them and brings them before the court. The indictment is an accusation, and nothing more. The indictment is not evidence and the jury must not give it any weight in arriving at its verdict.

Will you accept and apply this rule of law?

☐ Yes ☐ No

If no, please explain.

Juror Name: _____

Juror Number: _____

105. Can you accept that the defendants, at this moment, are presumed to be innocent of any and all crimes charged in this indictment and that they are presumed to be innocent of these charges throughout the course of this trial?

☐ Yes ☐ No

If no, please explain.

106. Under the law, the facts are for the jury to determine and the law is for the judge to determine. You are required to accept the law as the judge explains it to you, even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Will you accept and apply this rule of law?

☐ Yes ☐ No

If no, please explain.

107. It is the law that the testimony of a single witness can be sufficient to convict a defendant of a charged crime if the jury finds that the testimony of that witness established proof beyond a reasonable doubt. Do you have any opinion or belief that would prevent you from applying this rule of law?

☐ Yes ☐ No

If yes, please explain.

Juror Name: _____

Juror Number: _____

108. Some of the evidence in this case was obtained through the use of search warrants for individuals' email accounts, online file storage accounts, and other Internet activity. This evidence was obtained legally. Do you have any feelings about the use of such evidence that would prevent you from being fair and impartial in this case?

☐ Yes ☐ No

If yes, please explain.

109. The law does not require that any particular investigative techniques be used by law enforcement authorities to uncover or prosecute crime. Do you believe that any particular type of evidence, such as forensic evidence or audio or video recordings, are required to prove a defendant guilty beyond a reasonable doubt? Would you have any difficulty in finding the defendant guilty if the government proved its case beyond a reasonable doubt without such evidence?

☐ Yes ☐ No

If yes, please explain.

110. Under the law, a defendant need not testify or offer any evidence on his or her behalf. If a defendant does neither, the jury is not permitted to consider that fact in any way in reaching a decision as to whether a defendant is guilty or not guilty.

Will you accept and apply this rule of law?

☐ Yes ☐ No

If no, please explain.

Juror Name: _____

Juror Number: _____

111. Several witnesses in this case will be law enforcement officers. A law enforcement witness' testimony is not to be given any more or less weight than any other witness' testimony simply because that witness is a law enforcement officer.

Will you accept and apply this rule of law?

☐ Yes

☐ No

If no, please explain.

112. At the conclusion of the case the Court will instruct you on the law and explain to you the elements of the crimes charged in the indictment. Do you have any personal, religious, philosophical, political or other beliefs as to what the law is or should be that would make it difficult to follow the instructions of the Court or what would make it difficult for you to sit in judgment of another or lead you to render a verdict without regard to the law or the evidence?

☐ Yes

☐ No

If yes, please explain.

Juror Name: _____

Juror Number: _____

113. The question of possible punishment of the defendants is of no concern to the jury and, pursuant to your oath as jurors, you cannot allow any consideration of the punishment that may be imposed upon the defendants, if they are convicted, to enter into or influence your deliberations in any sense or manner. The duty of imposing sentence rests exclusively upon the court. Will you be able to follow this rule without any difficulty?

☐ Yes ☐ No

If no, please explain.

114. Under the law, emotions such as sympathy, bias and prejudice must not enter into the deliberations of the jurors as to whether the guilt of the defendants have been proven beyond a reasonable doubt. Will you be able to follow this rule without any difficulty?

☐ Yes ☐ No

If no, please explain.

Do you have any bias, sympathy, or prejudice toward either the defendants or the government in this case?

☐ Yes ☐ No

If yes, please explain:

Juror Name: _____

Juror Number: _____

MEDIA AND DISCUSSIONS/KNOWLEDGE OF THE CASE

115. This case may receive media attention. Will you be able to follow the Court's instruction that you are not to watch television, go on the Internet, including Facebook, Twitter, Instagram or blogs, and/or listen to or watch any media coverage regarding this case, that you are not to discuss the case with family or friends until the trial and your deliberations have concluded, that you are not to discuss the case with fellow jurors until time for deliberations, and that the only information you are permitted to consider is that which is presented in court?

☐ Yes

☐ No

If no, please explain.

116. Will you be able to follow the Court's instruction that you are not to conduct your own research or investigation concerning any aspect of the case, including anything about the defendants, witnesses, attorneys, or the court, by using the Internet or any other research medium?

☐ Yes

☐ No

If no, please explain.

117. Will you have any difficulty in not discussing the case with anyone, except with your fellow jurors in the jury room, after the judge directs you to begin your deliberations?

☐ Yes

☐ No

If yes, please explain.

Juror Name: _____

Juror Number: _____

118. If you were selected to serve on this jury, would you consider and respect the view of other jurors even if their views differed from yours, in accordance with the Court's instructions?

☐ Yes

☐ No

If no, please explain:

119. Have you, at any time, read, seen, heard, discussed, written or communicated anything about this case, or anyone connected to the case, in the newspapers, on television, through the internet, on social media, while listening to the radio, talking with other people or through any other source?

☐ Yes

☐ No

Please describe in detail what you have read, seen, heard, or discussed about this case and the defendant, or anything else connected to the case including the source of information:

If yes, would the information you read, saw, or heard affect your ability to serve as an impartial juror in this case?

☐ Yes

☐ No

If yes, please explain:

Juror Name: _____

Juror Number: _____

120. The case for which you are summoned involves criminal charges against the defendants Thomas Joseph Barrack and Matthew Grimes. Before today, have you read, seen, or heard anything about either defendant or the case? (This includes not only anything you may have seen or read in the media, but also anything you might have heard from relatives, friends or coworkers.)

☐ Yes ☐ No ☐ Sounds familiar, but unsure

- a. If Yes, how closely have you been following the case brought against Thomas Joseph Barrack and Matthew Grimes?

☐ Very closely

☐ Somewhat closely

☐ I have heard of the case, but I have not been following it

☐ Not at all

- b. If Yes, from what sources have you heard about the case? _____

- c. If Yes, please describe in detail what you recall reading, seeing, or hearing about the defendants, the alleged crimes, the court proceedings, or the people involved (regardless of whether you believe this information is accurate):

Juror Name: _____

Juror Number: _____

121. Do you personally know Thomas Joseph Barrack or Matthew Grimes, the individuals on trial, or any of their family members?

☐ Yes ☐ No

a. If Yes, please identify who you know and how you know them:

122. Have you formed any opinions about this case?

☐ Yes ☐ No

a. If Yes, please describe:

- b. If Yes, do you have an opinion as to the guilt or innocence of Thomas Joseph Barrack?

☐ Yes ☐ No

- c. If Yes, do you have an opinion as to the guilt or innocence of Matthew Grimes?

☐ Yes ☐ No

- d. Are you able to set aside anything you have read, heard, or seen, and consider only the evidence presented in this case and this Court's instructions on the law?

☐ Yes ☐ No

123. Do you feel like Mr. Barrack or Mr. Grimes might start off even a little bit behind before this case begins because they have been charged with crimes or because of what you have read, heard, or seen about the case?

☐ Yes ☐ No

124. Is there anything that you have heard about this case that you feel would make it hard for you to be a juror in this case?

☐ Yes ☐ No

a. If Yes, please explain: _____

Juror Name: _____

Juror Number: _____

125. In general, would you view the evidence presented by the defense differently than you would the evidence presented by the prosecution?

☐ Yes ☐ No

b. If Yes, how? _____

SCHEDULING AND HARDSHIP INFORMATION

Jury selection will begin on September 19, 2022. The Court and the parties estimate that after a jury is selected, this case will last **approximately four weeks**, with the Court sitting Monday through Thursday. The trial day will be from 9:30 a.m. to 4:30 p.m.

Jury service is one of the highest duties and privileges of a citizen of the United States. Mere inconvenience or the usual financial hardships of jury service will not be sufficient to excuse a prospective juror.

Please complete the following:

126. Do you have any health issues (e.g., hearing, seeing, etc.) that would interfere with your

Juror Name: _____

Juror Number: _____

ability to serve as a juror in this case?

☐ Yes ☐ No

a. If Yes, please explain: _____

127. Do you have any non-health issues (e.g., family obligations, work hours, etc.) that would interfere with your ability to serve as a juror in this case?

☐ Yes ☐ No

b. If Yes, please explain: _____

128. Do you have any difficulty with your eyesight or hearing?

☐ Yes ☐ No

a. If Yes, please explain: _____

129. Are you taking any medication(s) regularly that affect your memory, concentration, or stamina? ☐ Yes ☐ No

130. Do you have any moral, religious, or ethical beliefs that prevent you from sitting in judgment of another person or that will make it difficult to render a verdict in this case?

☐ Yes ☐ No

c. If Yes, please explain: _____

131. Do you wish to apply to the Court to be excused on the grounds that jury service in this

Juror Name: _____

Juror Number: _____

case would be a serious hardship to you?

☐ Yes ☐ No

a. If Yes, please explain: _____

132. Are there any questions that you would prefer to discuss privately? If so, please write down the number(s) of the question(s) here: _____

133. Is there any matter that you should call to the court's attention that may have any bearing on your qualifications to serve as a juror, or that may affect your ability to render an impartial verdict based solely on the evidence and the court's instructions on the law?

☐ Yes ☐ No

a. If Yes, please explain: _____

This image shows a full page of white paper with horizontal blue ruling lines. The lines are evenly spaced and run across the width of the page, providing a template for handwriting practice or general writing. There are no margins, text, or other markings on the page.

This image shows a full page of blank handwriting practice paper. It features multiple sets of horizontal blue lines spaced evenly down the page. Each set consists of three lines: a solid top line, a dashed middle line, and a solid bottom line, providing a guide for letter height and placement. The paper is otherwise completely blank, with no text or other markings.

Juror Name: _____

Juror Number: _____

ATTACHMENT A

A. Defense Table – Thomas Joseph Barrack

1. Thomas Joseph Barrack
2. Daniel Petrocelli, Esq.
3. James Bowman, Esq.
4. Randall Jackson, Esq.
5. Michael Schachter, Esq.
6. Steven Ballew, Esq.
7. Casey Donnelly, Esq.

B. Defense Table – Matthew Grimes

1. Matthew Grimes
2. Abbe Lowell, Esq.
3. Sofia Arguello, Esq.
4. Johanna Rae Hudgens, Esq.
5. David Kolansky, Esq.

C. Government Table

1. Assistant U.S. Attorney Ryan Harris
2. Assistant U.S. Attorney Samuel Nitze
3. Assistant U.S. Attorney Hiral Mehta
4. Assistant U.S. Attorney Craig Heeren
5. Trial Attorney Matthew McKenzie
6. FBI Special Agent Anthony Casola

D. Possible Witnesses and Other Names Referenced at Trial

1. Abu Dhabi Investment Authority (“ADIA”)
2. Zainab Ahmad, Esq.
3. Abdullah Al Ghafli
4. Khalifa Ali Saeed Husain Al Ghafli
5. Mohammed Al Ghafli
6. Rashid Sultan Rashid Al Malik Alshahhi, also known as Rashid al Malik
7. Khaldoon Al Mubarak
8. Minister Abdullah bin Zayed Al Nahyan
9. UAE President Mohamed bin Zayed Al Nahyan
10. UAE National Security Advisor Tahnoon bin Zayed Al Nahyan
11. Ali Saeed Al Neyadi
12. UAE Ambassador Yousef Al Otaiba
13. Yasir Al Rumayyan
14. Ali Mohammed Bin Hammad Al Shamsi
15. Saudi Arabian Crown Prince Mohammed bin Salman Al Saud
16. Andriana Albert
17. FBI Special Agent Jason Alberts

Juror Name: _____

Juror Number: _____

18. Ahmed Almehairbi
19. Gregory Andres, Esq.
20. FBI Special Agent Jacob Balog
21. Stephen Bannon
22. Courtney Beach
23. David Belford
24. Owen Blicksilver
25. Erin Burnett
26. Jonathon Burns, Esq.
27. FBI Special Agent Richard Busick
28. Justin Chang
29. FBI Special Agent Warren Chiu
30. Former Director of the National Economic Council Gary Cohn
31. Colony Advisors, LLC
32. Colony Capital, Inc.
33. Colony NorthStar, Inc.
34. Christine Dal Bello
35. Bruno Daddi
36. Dr. Christopher Davidson
37. Thomas Davis
38. DigitalBridge Group, Inc.
39. Clare Duan
40. Peter Eichler
41. Ted Elkin
42. Jon Farkas
43. Jon Finer
44. Karren Fink
45. Former National Security Advisor Michael Flynn
46. Paul Fuhrman
47. Marc Ganzi
48. Richard Gates
49. Ziad Ghandour
50. FBI Special Agent Walter Giardina
51. Jessica Gibbs
52. Rhona Graff
53. FBI Special Agent Nicholas Grimaldi
54. Jonathan Grunzweig
55. Ashley Hall
56. Donna Hansen
57. Miles Hansen
58. Rashid Haptoor
59. Robby Haugh
60. Mark Hedstrom
61. Howard Heiss, Esq.
62. Matthew Herrington, Esq.

Juror Name: _____

Juror Number: _____

63. Michael Higgins
64. Heather Hunt
65. Benjamin Jenkins
66. James Jeong
67. Dr. Eliot Kalter
68. Former Chief of Staff John Kelly
69. William Kelly
70. Former Secretary of State John Kerry
71. Jared Kushner
72. Dee Dee Lancaster
73. Robert Lowe
74. Cari Lutkins
75. DSS Special Agent Matthew Maguire
76. Paul Manafort
77. Allison Marckstadt
78. Isabelle Marsh
79. Former Secretary of Defense James Mattis
80. Former Deputy National Security Advisory K.T. McFarland
81. Former National Security Advisor H.R. McMaster
82. FBI Special Agent Tracee Mergen
83. Sean Misko
84. Former Secretary of Treasury Steven Mnuchin
85. David Monahan
86. Mubadala Investment Company
87. Former Director of the FBI Robert Mueller
88. George Nader
89. Whitney Nicholas
90. Alex Own
91. David Palame
92. Heidi Parsons.
93. Former Secretary of State Michael Pompeo
94. Bernard Pean
95. Walid Phares
96. Keith Phillips
97. Ramsey Ratcliffe
98. John Luke Reynolds
99. Daniel Rivetti
100. Charles Rose
101. Former Secretary of Commerce Wilbur Ross
102. Stephanie Ruhle
103. Erik Schatzker
104. Avery Schwartz
105. FBI Special Agent Elizabeth Sidaros
106. CBP Officer Egbert Simon
107. FBI Forensic Accountant Grant Smith

Juror Name: _____

Juror Number: _____

- 108. Rocio Soler
- 109. Former U.S. Congressman Stephen Stockman
- 110. Sylvio Tabet
- 111. Former Secretary of State Rex Tillerson
- 112. Tobar Properties
- 113. Former President Donald J. Trump
- 114. Shawn Tully
- 115. Madeleine Westerhout
- 116. UAE Supreme Council for National Security

E. Possible Locations Referenced at Trial

- 1. Abu Dhabi, United Arab Emirates
- 2. Al Bateen Executive Airport, Abu Dhabi, United Arab Emirates
- 3. 10580 Wilshire Boulevard, Los Angeles, California
- 4. Van Nuys Airport, Los Angeles, California
- 5. 1525 San Vicente Boulevard, Santa Monica, California
- 6. 1301 Constitution Avenue NW, Washington, District of Columbia
- 7. Kailua, Hawaii
- 8. Tangier Ibn Battouta Airport, Tangier, Morocco
- 9. Grand Hotel Villa de France, Tangier, Morocco
- 10. Tangier, Morocco
- 11. Teterboro Airport, Teterboro, New Jersey
- 12. 98 Meadowlark Lane, Bridgehampton, New York
- 13. 37 Ocean Avenue, East Hampton, New York
- 14. Francis S. Gabreski Airport, Westhampton Beach, New York
- 15. Dammam, Saudi Arabia
- 16. Riyadh, Saudi Arabia